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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

) MDL No. 3047
) Case No. 4:22-03047-YGR
) Honorable Yvonne Gonzalez Rogers
) Honorable Peter H. Kang
)

14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS

) **OMNIBUS SEALING STIPULATION**
) **AND [PROPOSED] ORDER**
) **REGARDING DKT. NOS. 848, 849**
) **(JOINT LETTER BRIEF RE:**
17 **YOUTUBE’S CUSTODIANS)**
)
18)
19)

Pursuant to Civil Local Rules 7-11 and 79-5, the Court's May 22, 2023 Protective Order (Dkt. No. 290), and the August 1, 2023 Order Granting Motion To File Under Seal; Setting Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively, "YouTube") and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation in connection with their Joint Letter Brief on Whether YouTube Must Designate Additional Custodians (the "Joint Letter Brief") and its exhibit filed on May 15, 2024. ECF Nos. 848-849.

The Parties have met and conferred regarding the proposed sealing designations. At this time, Plaintiffs do not oppose the sealing request and reserve all rights to challenge designations and sealing in the future. Accordingly, the Parties stipulate to the following charts.

I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR PROVISIONAL REDACTIONS

Dkt. No.	Description	Requested Action	Designating Party	YouTube's Basis for Sealing	Previously Sealed
848	Joint Letter Brief on Whether YouTube Must Designate Additional Custodians	Maintain redactions at 1, 2, 3.	YouTube	YouTube seeks to redact personal identifying information such as job titles, job descriptions, and direct quotes of YouTube employees proposed or designated to be document custodians in this case. Disclosure of YouTube employees' identities violates their privacy interests and could cause them to receive threatening contact from the public. Indeed, YouTube employees have previously been identified, doxxed, harassed, and threatened due to their mere connection to YouTube's public	No.

Dkt. No.	Description	Requested Action	Designating Party	YouTube's Basis for Sealing	Previously Sealed
				filings in litigation. Chiou Decl. ¶ 4.	
849	Exhibit A to Joint Letter Brief	Maintain under seal	YouTube	<p>Exhibit A to the Joint Letter Brief contains substantial personal identifying information for 69 YouTube employees who have been proposed or designated to be document custodians in this case.</p> <p>Exhibit A contains descriptive information—including direct quotes from the employees, job titles and descriptions, and other personally identifiable information—that could reveal the private identities of YouTube's employees.</p> <p>All this information is also presented in a single, easily accessible chart with explicit reference to the present litigation that may serve as a roadmap for potential bad actors to identify, doxx, harass, and threaten YouTube's employees as they have historically done. Chiou Decl. ¶ 4.</p>	No.

The Parties therefore agree that the above information may be sealed in connection with the Joint Letter Brief.

IT IS SO STIPULATED AND AGREED.

Respectfully submitted,

DATED: May 29, 2024

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ATTESTATION

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: May 29, 2024

By: /s/ Christopher Chiou
Christopher Chiou

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

) MDL No. 3047
)
) CASE NO.: 4:22-md-03047-YGR
)

THIS DOCUMENT RELATES TO:
ALL ACTIONS

) **[PROPOSED] ORDER ON**
) **DEFENDANTS YOUTUBE, LLC AND**
) **GOOGLE LLC'S OMNIBUS MOTION**
) **TO SEAL**
)

) Honorable Yvonne Gonzalez Rogers
) Honorable Peter H. Kang
)

Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion To File Under Seal; Setting Sealing Procedures (Dkt. No. 341), and after consideration of the moving, opposition, and reply papers, supporting declarations, the arguments of counsel, and all other matters presented to the Court, the Court rules that good cause exists to seal portions of the following documents relating to Joint Letter Brief on Whether YouTube Must Designate Additional Custodians:

Dkt. No.	Description	Requested Action	Court's Ruling
848	Joint Letter Brief on Whether YouTube Must Designate Additional Custodians	Maintain redactions at 1, 2, 3.	Granted _____ Denied _____
849	Exhibit A to Joint Letter Brief on Whether YouTube Must Designate Additional Custodians.	Seal in entirety.	Granted _____ Denied _____

IT IS SO ORDERED.

DATED: _____

HONORABLE PETER H. KANG
UNITED STATES DISTRICT JUDGE